

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the  
Southern District of Texas

Houston Division

HUGUET JUNIOR NDZAKA MOUANDA

Case No.

4:24cv0019

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

NAVY FEDERAL CREDIT UNION

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ NoUnited States Courts  
Southern District of Texas  
FILED

January 03, 2024

Nathan Ochsner, Clerk of Court

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	HUGUET JUNIOR NDZAKA MOUANDA
Street Address	3411 TALL SYCAMORE TRAIL
City and County	KATY, HARRIS
State and Zip Code	TEXAS, 77493
Telephone Number	+1(346-593-2248)
E-mail Address	Huguetjunior@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name	NAVY FEDERAL CREDIT UNION
Job or Title <i>(if known)</i>	
Street Address	820 Follin Lane SE
City and County	VIENNA FAIRFAX COUNTY
State and Zip Code	VIRGINIA 22180
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

15 U.S. Code § 1605

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the  
State of *(name)* \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated  
under the laws of the State of *(name)* \_\_\_\_\_,  
and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* \_\_\_\_\_, is a citizen of  
the State of *(name)* \_\_\_\_\_. Or is a citizen of  
*(foreign nation)* \_\_\_\_\_.

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b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under  
the laws of the State of (name) \_\_\_\_\_, and has its  
principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

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**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

SEE ATTACHED

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**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

SEE ATTACHED

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 01/03/2024

Signature of Plaintiff

*Huguet Junior*

Printed Name of Plaintiff

HUGUET JUNIOR NDZAKA MOUANDA

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Huguet Junior Ndzaka Mouanda  
3411 Tall Sycamore trail  
Katy Tx 77493  
346-593-2248  
Huguetjunior@gmail.com

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

Huguet Junior Ndzaka Mouanda,

Case No.:

Plaintiff,

vs.

Navy Federal Credit Union,

Defendant.

This is an action being brought by Plaintiff seeking damages from Defendant.

**JURISDICTION AND VENUE**

1. Jurisdiction of this court arises from 28 U.S.C. 1331 and 15 U.S.C. 1605

**PARTIES**

2. Plaintiff Huguet Junior Ndzaka Mouanda is a consumer residing in Texas.
3. Defendant Navy Federal Credit Union is an organization headquartered in Virginia

**STATEMENTS OF FACTUAL ALLEGATIONS**

4. On October 03, 2023 plaintiff entered into a consumer credit transaction for an auto loan with defendant in the amount of \$30,000.00
5. After closely reviewing the truth in lending disclosures, plaintiff noticed there were a few violations.
6. Defendant has not made it clear and conspicuous to plaintiff that the finance charge is the sum of all charges.
7. The truth in lending disclosure in exhibit A shows the finance charge being less than the sum of all charges therefore violating 15 U.S. Code § 1605.
8. Defendant failed to provide information which he is required to disclose under the provisions of 15 U.S. Code Subchapter I - CONSUMER CREDIT COST DISCLOSURE.
9. Plaintiff was charged more than the finance charge and Insurance was not included in the finance charge as well as interest.
10. Defendant has not provided adequate disclosures to plaintiff which resulted in plaintiff being a victim of unfair credit billing practices.
11. Plaintiff sent a letter of dispute via certified mail tracking 9589071052701125558701  
(See Exhibit B)
12. Defendant did not respond to plaintiff's notice of dispute within the timeframe requested.

**VIOLATIONS**

13. Defendant violated 15 U.S. Code § 1605

1 14. Defendant failed to provide adequate disclosures to plaintiff regarding the consumer  
2 credit transaction.

3 15. Defendant was not clear and conspicuous which resulted in the plaintiff being a victim of  
4 unfair credit billing practices.  
5

6  
7 **RELIEF**  
8

9 16. Plaintiff respectfully requests a judgment entered against Defendant for the following:

10 A. Statutory damages of \$5,000 per 15 U.S. Code § 1611.

11 B. Statutory damages of twice the amount of any finance charge (\$16,065.53) per 15  
12 U.S. Code § 1640.

13 C. Reimbursement of all filing fees.

14 D. Any other relief, including equitable relief, that this Court deems appropriate.  
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16  
17  
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19 Dated: 01/03/2024  
20

21 Signature: Huguet Junior

22 By: Huguet Junior Nozaky Morand  
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